

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Abdi Nazemian, et al.,
Plaintiffs,
vs.
NVIDIA Corporation,
Defendant.

Case No. 4:24-cv-01454-JST
Case No. 4:24-cv-02655-JST

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER RE ESI PROTOCOL AND
PROTECTIVE ORDER SCHEDULE**

Judge: Hon. Jon S. Tigar
Courtroom: 6 - 2nd Floor

Andre Dubus III, et al.,
Plaintiffs,
vs.
NVIDIA Corporation,
Defendant.

Case No. 4:24-cv-01454-JST
Case No. 4:24-cv-02655-JST

1 Pursuant to Civil Local Rule 7-12 and the Court's Minute Entry for proceedings held on October
2 21, 2024, (ECF No. 80), the undersigned Parties to the above-captioned action, by and through their
3 respective counsel of record, hereby stipulate the following:

4 1. WHEREAS, on August 29, 2024, the Parties appeared before the Honorable Judge Tigar
5 for an Initial Case Management Conference, (ECF No. 66);

6 2. WHEREAS, on September 9, 2024, the Court ordered the Parties to meet and confer on a
7 proposed protective order and ESI protocol order, and established a schedule and requirements for
8 submitting briefs if Parties could not reach agreement, (ECF No. 68);

9 3. WHEREAS, the Parties submitted their respective ESI protocol and protective order
10 proposals and accompanying briefs on September 9, 2024, (ECF Nos. 73, 74), and responses and
11 supplemental submissions thereafter (ECF Nos. 75, 76, 79);

12 4. WHEREAS, on October 21, 2024, the Parties appeared before the Court to present
13 arguments regarding their respective ESI protocols and protective order proposals (ECF No. 80);

14 5. WHEREAS, the Court directed the Parties to further meet and confer to resolve disputed
15 issues in their respective ESI protocol and protective order proposals, and to submit a stipulation or
16 competing proposals with accompanying briefs by November 4, 2024 (ECF No. 80);

17 6. WHEREAS, on November 4, 2024 the Parties stipulated to extend the deadline for
18 submitting a stipulation or competing proposals with accompanying briefs from November 4, 2024 to
19 November 14, 2024 (ECF No. 84), which was ordered by the Court on November 5, 2024 (ECF No. 85);

20 7. WHEREAS, the Parties have engaged in five (5) meet and confer conferences for over five
21 hours collectively and exchanged numerous redlined drafts of the ESI protocol and protective order
22 proposals since October 21, 2024, and have made significant progress toward narrowing the disputed
23 issues in the respective proposals; and

24 8. WHEREAS, the Parties believe that they can make additional progress by continuing to
25 meet and confer on the remaining disputed issues.

26 NOW, THEREFORE IT IS HEREBY STIPULATED, by and between the Parties and their
27 respective counsel, that the Parties' deadline to submit a stipulation, or competing proposed ESI

1 Protocols, Protective Orders, and supportive briefs not to exceed 5 pages, shall be extended from
2 November 14, 2024 to November 18, 2024.

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1 Dated: November 14, 2024

Respectfully submitted,

2 By: /s/ Joseph R. Saveri

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31 *Class*

1 Dated: November 14, 2024

Respectfully submitted,

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36 *Counsel for the Dubus Plaintiffs and Proposed Class*

1 Dated: November 14, 2024

Respectfully Submitted,

2 By: /s/ Sean S. Pak

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23 *Attorneys for Defendant NVIDIA Corporation*

~~PROPOSED~~ ORDER

Pursuant to the stipulation of the Parties, and for good cause appearing, it is hereby ORDERED that the Parties deadline for filing a stipulated ESI Protocol and stipulated Protective Order, or filing the Parties' respective proposals and briefs shall be continued to November 18, 2024.

IT IS SO ORDERED.

Dated: November 15, 2024

The Honorable Jon S. Tigar
U.S. District Court Judge

1 **ATTESTATION PURSUANT TO CIVIL L.R. 5-1**

2 The filer attests that the other signatories listed, on whose behalf the filing is also submitted,
3 are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

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5 Dated: November 14, 2024

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/s/ Joseph R. Saveri
Joseph R. Saveri